



# Air Permit Streamlining

## Past, Present & Future Outlook

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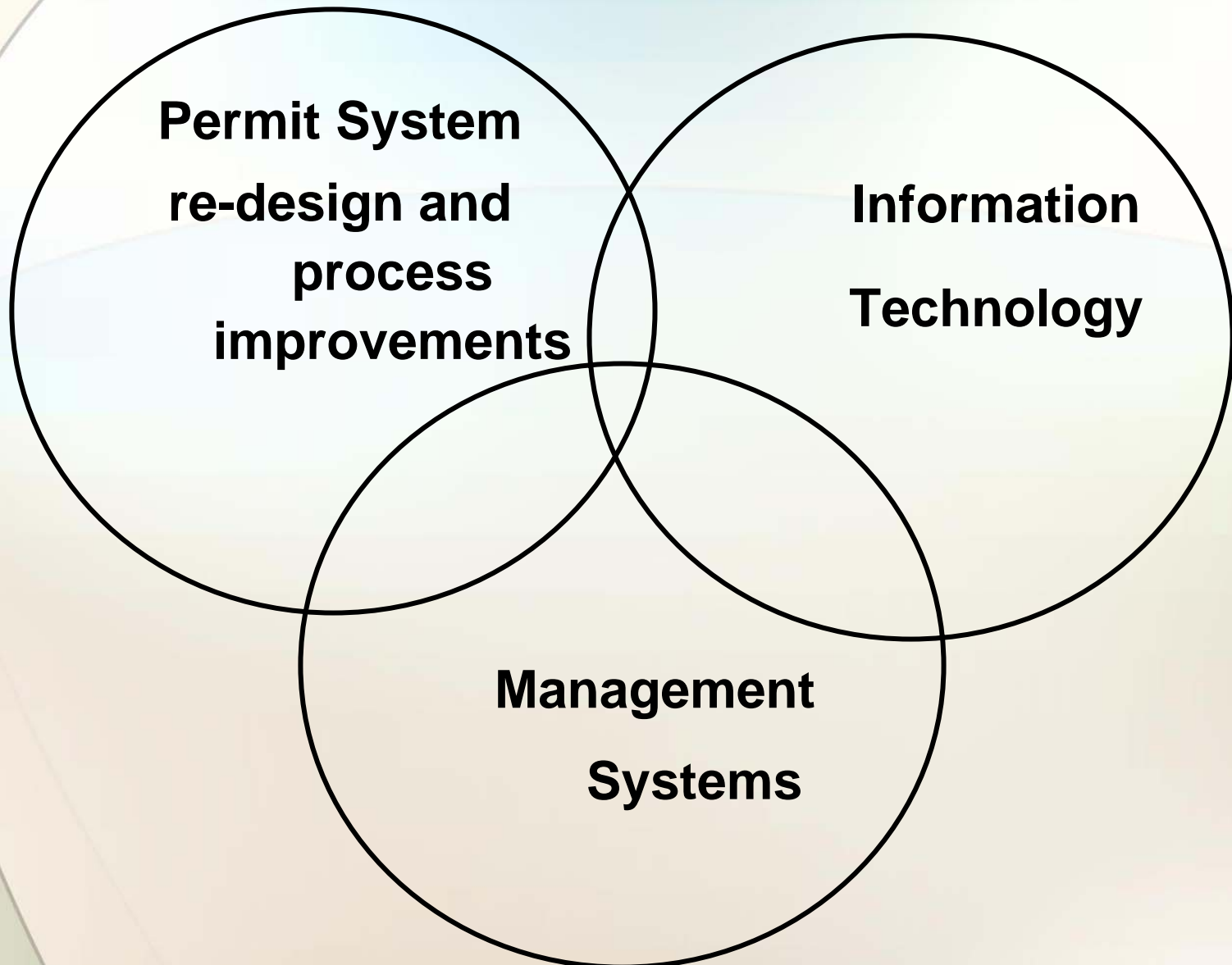
# Impetus for Air Permit Streamlining

- **WMC Report (May 2003)**
- **Act 118 (Feb 2004)**
- **LAB Report (Feb 2004)**
- **EPA Notice of Deficiency (Mar 2004)**

# APII Objectives

- **Improve efficiency of permit system**
- **Lower business costs**
- **Safeguard air quality**

# APII - Three Major Components



# Public Interests

- **Have more meaningful opportunities to provide input**
  - **Earlier in the process**
  - **Greater clarity on what can comment on and what it can effect**
- **Have information about air quality and emissions easily accessible**

# DNR Interests

- **Protect and improve air quality**
- **Focus time & effort on largest and most complex emission sources**
- **Focus time & effort on situations that have environmental benefit**
- **Have information management systems to better manage the permit process**
- **Have ability to make information accessible to industry and the public**

# Industry Interests

- **Ability to start construction projects quickly**
- **Consistent requirements across industries and DNR regions**
- **Eliminate conflicting requirements due to multiple permits**
- **Reduce costs (time, consulting and fees)**
- **More certainty w/r when permit will be issued and what will be required**

# Overall Strategy for Permit Re-design

The universe of emission sources

- **Lots of small emission sources – about 1500 minor sources emit about 6% of reported emissions**
- **About 550 sources emit 94% of emissions – and largest 25 sources emit about 70% of reported emissions**
- **Diverse companies & industries have different needs – based on change within the industry, technology and markets, culture of company, complexity & level of air emissions**



# **But, we treat them all the same**

- **One type of permit – “traditional”**
- **All of these sources get a similar type of permit following a similar process**
- **An individually tailored permit that usually requires a fair amount of back & forth between DNR permit engineer and the company**

# Permit Improvements

- **Different types of permits for different situations:**
  - **Registration permits** – a standard permit for sources with low actual emissions
  - **General Permits** – a standard permit for industries or processes with similar emissions, operations, etc.
  - **Individually tailored permits** - (However these permits & permitting process will be different)

# **Procedure: History & Future**

## **Registration & General Permits**

- **Rule adopted**
- **Web application process developed for Registration Operation Permits**
- **Workshops planned**
- **Start issuing permits in October**

# Procedure: History

## **Traditional Permits**

**Short Term – Guidance on technical issues**

**Long Term – Redesign**

## **July 2005**

- **Ideation session – A clear direction & a surprising amount of agreement between the DNR & Industry**
- **Immediate Focus -- Regulatory Triggers, Emission Caps and Consolidated Permits**

# Regulatory Triggers

- **Are there ways to reduce or eliminate required permit actions where the environmental benefits and the environmental risk are low?**

# Emission Caps (Bubbles)

- **Are there ways to cap emissions from a facility or process line at a specified level and provide more flexibility to the facility and protect air quality?**

# Consolidated Permit Process

- **Are there ways to reduce conflicting requirements due to multiple permits?**

# Other Ideas

- **Improve the permit application process**
- **Standardize requirements when appropriate**
- **Create a three-part permit that addresses transitions, expiring conditions, etc.**



# Procedure: Future

**September 2005** - Decide on foundation of redesigned system (consolidated permits, regulatory triggers, emission cap permits)

**November 2005** - If needed, introduce legislation & start rule development

**December 2006** - Target date for rule adoption

**Policy work will be done concurrently with IT development & management system improvement work**

# Today's Objectives

- **Present proposal or alternatives**
  - **Questions and answers to clarify**
  - **Discuss**

## September 14 Meeting

- **Present revised proposal/alternatives**
  - **Discuss**
    - **Get a sense of the group**

## End of September

- **Revise based on Sept. 14 feedback**